REMARKS

[0002] Applicant respectfully requests reconsideration and allowance of all of the claims of the application. The status of the claims is as follows:

-Claims 1-31 are currently pending.

-Claims 1, 15, and 27are amended herein.

§ 103 Rejections

[0003] Claims 1-31 stand rejected under 35 U.S.C. § 103(a) as allegedly being obvious over US Patent No. 6,279,029 to Sampat *et al.* (hereinafter "Sampat") in view of U.S. Patent No. 6,581,102 to Amini *et al.* (hereinafter "Amini"). Applicant respectfully traverses the rejection.

Independent Claim 1

[0004] Applicant submits that the Office has not made a *prima facie* showing that independent claim 7 is obvious in view of the combination of Sampat and Amini. Applicant submits that the combination of Sampat and Amini does not teach or suggest the following features of this claim, as amended (with emphasis added):

> 1. A system comprising:
> a processor; and
> one or more computer-readable media, the one or more computer-readable media including:
> a presentation that includes media content, the media content comprising at least one of audio content and video content;

a media engine to obtain input information from the media content, the media engine including at least one transform and at least one media sink, and the input information including media content descriptor information and media type information;

a destination object to receive the input information from the media engine, the destination object further selectively associates the input information with one or more output presentation descriptors, and to provide the one or more output presentation descriptors to the media engine; and

an application to provide the presentation to an output target, the application further configured to dynamically create the media engine *and the destination object*,

wherein the media engine is further configured to setup at least one transform and obtain at least one media sink based on the one or more output presentation descriptors provided by the destination object to process the presentation for output to the output target.

[0005] First, claim 1 recites in part, "an application to provide the presentation to an output target, the application further configured to dynamically create the media engine *and the destination object*." (Emphasis added). As further recited in Claim 1, "the media engine" includes "at least one transform and at least one media sink." The cited references to Sampat and Amini do not teach or suggest this element.

[0006] Specifically, as noted in the Office Action, the cited reference to Sampat does not disclose this element of Claim 1. (Office Action, Page 3, Paragraph 4).

[0007] Moreover, the deficiencies of Sampat with respect to this element are not remedied by Amini. As best understood by the Applicant, the Office Action cites column

1, line 49- column 6 line 9 of Amini, which discusses the creation of "predefined graphs", as teaching the dynamic creation of a "media engine", and cites column 16, line 6- column 17, line 16 of Amini, which discusses the creation of a "filter", as teaching the dynamic creation of a "destination object." (Office action, Page 4, Paragraph 1).

[0008] However, the creation of a "filter", as disclosed by Amini, is not equivalent to the creation of a "destination object". Indeed, Amini discloses that a "filter" is an *isochronous* stream processing module. The relevant section of Amini discloses:

> Processing modules--software which implements isochronous processing algorithms. This document will use the term "stream processing modules" *as well as filters* to refer to the processing modules which manipulate media data as it is being streamed.

(Column 4, Lines 46-51; Emphasis added). Accordingly, the creation of a "filter" (stream processing module), as disclosed by Amini, at best, is similar to the creation of a "media engine", rather than teaching the creation of a "destination object", as recited in claim 1. For the sake of completeness, Applicant also notes that a "graphic", as disclosed by Amini, refers to "an interconnection of stream processing modules which work together to generate a media stream." (Column 4, Lines 52-55).

[0009] Thus, the combination of Sampat and Amini does not teach or suggest, "an application to provide the presentation to an output target, the application further configured to dynamically create the media engine *and the destination object*," as recited in claim 1. (Emphasis added).

[0010] Second, claim 1 also recites in part, "*a destination object* to receive the input information from the media engine, the destination object further selectively associates

the input information with one or more output presentation descriptors." (Emphasis added). The cited references to Sampat and Amini do not teach or suggest this element.

[0011] Specifically, as noted in the Office Action, the cited reference to Sampat does not disclose this element of Claim 1. (Office Action, Page 3, Paragraph 4).

[0012] Moreover, the deficiencies of Sampat with respect to this element are not remedied by Amini. Amini discloses using filters (isochronous stream processing modules), rather a "destination object", as recite in claim 1, to provide an output description. This relevant section of Amini discloses:

> The deMediaLoadIf and deMediaParseIf illustrate how filters identify an interface to meet the load and parse requirement of a media server. These interfaces allow the server to be configured such that when a media object of a particular type is loaded, the *configured filter* can perform the required processing. *This processing may include creating new files or simply describing the media object according to the abstraction required by the server.* This description may include filters which can be used to parse the media object.

(Column 4, Lines 46-51; Emphasis added). Thus, even assuming, *in arguendo*, that the "description" disclosed by Amini is equivalent to the "presentation descriptors" recited in Claim 1, Amini nevertheless discloses using filters (isochronous processing modules), rather a "destination object", to provide the description. Thus, the combination of Sampat and Amini does not teach or suggest, "*a destination object* to receive the input information from the media engine, the destination object further selectively associates

the input information with one or more output presentation descriptors," as recited in claim 1. (Emphasis added).

[0013] Consequently, the combination of Sampat and Amini does not teach or suggest all of the elements and features of this claim. Accordingly, Applicant respectfully requests that the rejection of this claim be withdrawn.

Dependent Claims 2-14 and 28-31

[0014] Claims 2-14 and 28-31 ultimately depend from independent claim 1. As discussed above, claim 1 is allowable over the cited documents. Therefore, claims 2-14 and 28-31 are also allowable over the cited documents of record for at least their dependency from an allowable base claim. These claims may also be allowable for the additional features that each recites.

Independent Claim 15

[0015] Applicant submits that the Office has not made a *prima facie* showing that independent claim 15 is obvious in view of the combination of Sampat and Amini. Applicant submits that the combination of Sampat and Amini does not teach or suggest the following features of this claim, as amended (with emphasis added):

> 15. A method for use by an application in presenting a presentation, the method comprising:
>
> *dynamically creating a media engine and a destination object* using an application that provides media content to an output target;

selectively providing input information describing media content to be presented in the presentation to the destination object in response to an operation by the media engine;

selectively associating the input information with output information using the destination object, the output information enabling the transformation of the presentation for output to an output target; and

providing the output information from the destination object to the media engine,

wherein the media engine provides the presentation to the output target without requiring further interaction with the application by selectively setting up one or more transforms and obtaining one or more media sinks based on the output information following dynamic creation of the media engine by the application.

[0016] First, claim 15 recites in part, "*dynamically creating a media engine and a destination object* using an application that provides media content to an output target." (Emphasis added). This element is substantially similar to the first element of claim 1. The cited references to Sampat and Amini do not teach or suggest this element.

[0017] Specifically, as noted in the Office Action, the cited reference to Sampat does not disclose this element. (Office Action, Page 3, Paragraph 4, referring to the first element of claim 1).

[0018] Moreover, the deficiencies of Sampat with respect to this element are not remedied by Amini. As best understood by the Applicant, the Office Action cites column 1, line 49- column 6 line 9 of Amini, which discusses the creation of "predefined graphs", as teaching the dynamic creation of a "media engine", and cites column 16, line 6-

column 17, line 16 of Amini, which discusses the creation of a "filter", as teaching the dynamic creation of a "destination object." (Office action, Page 4, Paragraph 1).

[0019] However, the creation of a "filter", as disclosed by Amini, is not equivalent to the creation of a "destination object". Indeed, Amini discloses that a "filter" is an *isochronous* stream processing module. The relevant section of Amini discloses:

> Processing modules--software which implements isochronous processing algorithms. This document will use the term "stream processing modules" *as well as filters* to refer to the processing modules which manipulate media data as it is being streamed.

(Column 4, Lines 46-51; Emphasis added). Accordingly, the creation of a "filter" (stream processing module), as disclosed by Amini, at best, is similar to the creation of a "media engine", rather than teaching the creation of a "destination object", as recited in claim 15. For the sake of completeness, Applicant also notes that a "graphic", as disclosed by Amini, refers to "an interconnection of stream processing modules which work together to generate a media stream." (Column 4, Lines 52-55).

[0020] Thus, the combination of Sampat and Amini does not teach or suggest, "*dynamically creating a media engine and a destination object* using an application that provides media content to an output target," as recited in claim 15. (Emphasis added).

[0021] Second, claim 15 also recites in part, "*a destination object* to receive the input information from the media engine, the destination object further selectively associates the input information with one or more output presentation descriptors." (Emphasis added). This element is substantially similar to the third element of claim 1. The cited references to Sampat and Amini do not teach or suggest this element.

[0022] Specifically, as noted in the Office Action, the cited reference to Sampat does not disclose this element. (Office Action, Page 3, Paragraph 4, referring to the third element of claim 1).

[0023] Moreover, the deficiencies of Sampat with respect to this element are not remedied by Amini. Amini discloses using filters (isochronous stream processing modules), rather a "destination object", as recite in claim 15, to provide an output description. This relevant section of Amini discloses:

> The deMediaLoadIf and deMediaParseIf illustrate how filters identify an interface to meet the load and parse requirement of a media server. These interfaces allow the server to be configured such that when a media object of a particular type is loaded, the *configured filter* can perform the required processing. *This processing may include creating new files or simply describing the media object according to the abstraction required by the server.* This description may include filters which can be used to parse the media object.

(Column 4, Lines 46-51; Emphasis added). Thus, even assuming, *in arguendo*, that the "description" disclosed by Amini is equivalent to the "presentation descriptors" recited in Claim 1, Amini nevertheless discloses using filters (isochronous processing modules), rather a "destination object", to provide the description. Thus, the combination of Sampat and Amini does not teach or suggest, "*a destination object* to receive the input information from the media engine, the destination object further selectively associates the input information with one or more output presentation descriptors," as recited in claim 15. (Emphasis added).

[0024] Consequently, the combination of Sampat and Amini does not teach or suggest all of the elements and features of this claim. Accordingly, Applicant respectfully requests that the rejection of this claim be withdrawn.

Dependent Claims 16-27

[0025] Claims 16-27 ultimately depend from independent claim 15. As discussed above, claim 1 is allowable over the cited documents. Therefore, claims 16-27 are also allowable over the cited documents of record for at least their dependency from an allowable base claim. These claims may also be allowable for the additional features that each recites.

[0026] In closing, Applicant's decision not to discuss the differences between the cited art and each dependent claim should not be considered as an admission that Applicant concurs with the conclusions set forth in the Office Action that these dependent claims are not patentable over the disclosure in the cited references. Similarly, Applicant's decision not to discuss differences between the prior art and every claim element, or every comment set forth in the Office Action, should not be considered as an admission that Applicant concurs with the interpretation and assertions presented in the Office Action regarding those claims. Indeed, Applicant believes that all of the dependent claims patentably distinguish over the references cited. Moreover, a specific traverse of the rejection of each dependent claim is not required, since dependent claims are patentable for at least the same reasons as the independent claims from which the dependent claims ultimately depend.

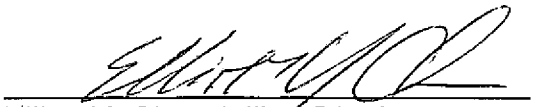
[0027] Furthermore, due to the Applicant's earnest belief that the claims, as rejected under Section 103(a), are allowable because their recited elements are not taught or suggested in the cited references, Applicant will not address motivation to combine with respect to the claims during this response. However, Applicant hereby reserves the right to further challenge motivation to combine the cited references.

Conclusion

[0028] Applicant submits that all pending claims are in condition for allowance. Applicant respectfully requests reconsideration and prompt issuance of the application. If any issues remain that prevent issuance of this application, the Examiner is urged to contact the undersigned representative for the Applicant before issuing a subsequent Action.

Respectfully Submitted,

Lee & Hayes, PLLC
Representative for Applicant



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